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BRYAN MUNICIPAL COURT
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IN THE BRYAN MUNICIPAL COURT
WILLIAMS COUNTY, OHIO

STATE OF OHIO : CASE NO. CRB2400102
:
v. : JUDGE KENT L. NORTH
:
JEREMY LEE SHEPHERD :

MOTION TO COMPEL PRODUCTION OF RECORDS AND DISCOVERY

Defendant moves this Court to compel production of records and discovery pursuant to Ohio Crim.R. 16, Brady v. Maryland, 373 U.S. 83 (1963), and basic due process.

These records are essential to Defendant's pending Motion to Vacate Judgment and defense of his constitutional rights.

I. 911 DISPATCH RECORDS - JANUARY 31, 2024

REQUEST:
- Complete audio recording of 911 call placed by Defendant
- Computer-aided dispatch (CAD) logs showing:
  - Time of call
  - Content of call
  - Information provided to Deputy Maynard
  - Deputy Maynard's location when dispatched
  - Timeline of deputy's arrival
  - Any notations about dog at residence

RELEVANCE:
Deputy Maynard's written statement claims he "entered the home" and went upstairs to contact the alleged victim. The 911 call and dispatch records will prove this statement is false. Defendant called 911 while alleged victim was already outside. Deputy never entered home.

This is Brady material - it directly contradicts the officer's sworn statement and proves the criminal complaint was based on false information.

II. LAW ENFORCEMENT RECORDINGS

REQUEST:
- Deputy Tyler Maynard body camera footage from January 31, 2024
- Dash camera footage from Deputy Maynard's vehicle
- Any audio recordings from the incident
- Mobile data terminal (MDT) records from Deputy's vehicle

RELEVANCE:
These recordings will prove Deputy Maynard never entered the home, contradicting his false statement. They will also document the actual interaction, including Defendant's criticism of the deputy's firearm handling (which motivated the retaliatory false complaint).

This is Brady material proving the complaint was based on fabricated information.

III. LISA NYE EMPLOYMENT AND AUTHORITY RECORDS

REQUEST:
- Complete employment records for Lisa L. Nye from Williams County Sheriff's Office (2013-present)
- All oaths of office taken by Lisa Nye
- All criminal complaints signed by Lisa Nye from 2013-present
- Any authorizations, directives, or policies allowing Sheriff's Office employees to sign criminal complaints as court officials
- Communications between Sheriff's Office, County administration, and Bryan Municipal Court regarding this practice
- Documentation of county legal counsel's approval of this arrangement (referenced in Ms. Nye's email)

RELEVANCE:
New evidence (Exhibit A - Lisa Nye email) proves Ms. Nye was continuously employed by Sheriff's Office while signing criminal complaints as "Deputy Clerk." Her 2013 oath (Exhibit D) was signed by Judge Kent L. North. These records will show the scope and duration of this conflicted practice and county officials' knowledge and approval of it.

This is essential to proving the complaint is void and establishing municipal liability.

IV. KYLEE TOWNE CONFLICT OF INTEREST RECORDS

REQUEST:
- Records of Kylee Towne's appointment as Director of Williams County Job and Family Services (October 2024)
- Records of her representation on the juvenile dependency docket
- Any conflict screening or waiver related to her representation of Defendant while serving in these roles
- Communications between Kylee Towne and JFS regarding Defendant's case
- Records of JFS involvement in removal of children from Defendant's home

RELEVANCE:
Defendant's court-appointed attorney became Director of the agency (JFS) that removed children from his home and has systemic interest adverse to him. She represented clients on

dependency docket while serving as his criminal defense attorney. These records will prove ineffective assistance of counsel due to conflict of interest.

V. COURT DOCKET METADATA AND AUDIT LOGS

REQUEST:
- Complete audit logs for Case No. CRB2400102 showing:
  - All docket entries with creation timestamps
  - All modifications to docket entries with timestamps
  - All deletions from docket with timestamps
  - User IDs of persons making entries/modifications
  - IP addresses or computer IDs used to access case
- System metadata for all entries dated November 26, 2025

RELEVANCE:
Screenshots with phone metadata (Exhibits B-1 and B-2) prove court entries were created on December 1, 2025 and backdated to November 26, 2025. Court audit logs will confirm this falsification of the official court record.

This is essential to proving consciousness of guilt and bad faith by the Court.

VI. COMMUNICATIONS AND COORDINATION

REQUEST:
- All communications between Deputy Tyler Maynard, Lisa Nye, Prosecutor James Duranczyk, and court officials regarding this case (January 31, 2024 - March 4, 2024)
- Communications regarding issuance of Temporary Protection Order before arraignment
- Communications regarding rescheduling of arraignment from March 21 to March 13, 2024
- Communications regarding the December 9, 2025 combined hearing
- Communications regarding backdating of November 26 entries

RELEVANCE:
These communications will show coordination among officials and demonstrate whether the procedural irregularities were intentional or negligent.

VII. ARRAIGNMENT RECORDING AND RIGHTS ADVISEMENT

REQUEST:
- Complete audio/video recording of March 13, 2024 arraignment
- Recording played to Defendant advising of rights
- Any written materials provided to Defendant
- Court reporter's notes or transcript if available

RELEVANCE:

Defendant was advised of rights via a recording rather than by the judge personally. Recording likely misstated the right to jury trial (led Defendant to believe bench trial was default). This is essential to proving plea was not knowing and voluntary.

VIII. EXCULPATORY EVIDENCE

REQUEST:
- All statements made by the juvenile accuser regarding the allegations
- All statements made by the juvenile accuser's mother
- Video recording referenced in discovery showing mother admits allegation was fabricated based on TV show
- Background and credibility information regarding juvenile accuser, including:
  - History of dishonesty
  - Current detention status (serving 3-month sentence)
  - Reasons for detention
- All records regarding foster placement of children removed from home
- All communications with foster family
- Mail return receipt showing Temporary Protection Order sent to alleged victim was returned as "undeliverable"

RELEVANCE:
This is classic Brady material. The accuser's mother admitted on video the allegation was fabricated after watching a South Park episode. Accuser has documented history of dishonesty and is currently detained. TPO could not be served on alleged victim. All of this is exculpatory and should have been disclosed before plea.

IX. ADA COMPLIANCE AND ACCOMMODATION RECORDS

REQUEST:
- All ADA policies and procedures for Bryan Municipal Court
- Training records for court staff on ADA compliance
- All documents related to Defendant's ADA accommodation requests
- Communications regarding Defendant's requests
- Any ADA coordinator designations or contacts

RELEVANCE:
Defendant filed detailed ADA accommodation request which Court ignored, then ordered opposite of requested accommodation. These records will show whether Court has any ADA compliance procedures and whether they were followed.

X. PROBATION RECORDS

REQUEST:
- Sealed probation violation report filed November 25, 2025

- All communications between Probation Officer Kelly Tietje and Defendant
- Report of stalking/harassment incident in courthouse parking lot (referenced in Defendant's communications with probation)
- All communications regarding filing of probation violation
- Probation department policies on accommodating disabled probationers

RELEVANCE:
Violation report is sealed, violating due process. Defendant reported harassment in parking lot; probation took no protective action then filed violation when Defendant asserted ADA rights. This proves retaliation.

XI. DEPUTY MAYNARD RECORDS

REQUEST:
- Complete personnel file for Deputy Tyler Maynard
- Date of birth and/or hire date
- Training records, especially firearms training
- Field training evaluations
- Any disciplinary records
- Any complaints against Deputy Maynard
- Supervisory review policies for criminal complaints
- Documentation of any supervisory review before this complaint was filed

RELEVANCE:
Deputy Maynard was approximately 21 years old at time of incident. His age and experience level are relevant to assessing his credibility, judgment, and training. Records will show whether Sheriff's Office has adequate supervision procedures and whether they were followed.

XII. TEMPORARY PROTECTION ORDER RECORDS

REQUEST:
- Complete file for Temporary Protection Order issued in this case
- Documentation of service or attempted service
- Copy of TPO faxed to Edon Police Department on March 6, 2024 (week before arraignment)
- Return receipt or proof of mailing showing TPO sent to alleged victim was returned as undeliverable
- Communications regarding issuance of TPO before arraignment

RELEVANCE:
TPO was issued and sent to police before Defendant was arraigned or advised of charges. TPO could not be served on alleged victim (returned undeliverable), yet court proceeded as if victim was accessible. This shows procedural irregularities and lack of actual victim involvement.

LEGAL AUTHORITY

Under Ohio Crim.R. 16, Defendant is entitled to discovery of material within possession or control of the State.

Under Brady v. Maryland and its progeny, the State must disclose evidence favorable to the accused, whether requested or not. Suppression of such evidence violates due process where the evidence is material to guilt or punishment.

Here, the requested materials include:
- Evidence proving the criminal complaint was based on false statements (dispatch records, body cam)
- Evidence proving the complaint is void (Lisa Nye records)
- Evidence proving ineffective assistance of counsel (Kylee Towne records)
- Evidence of exculpatory information withheld from defense (victim's mother's admission, accuser's credibility issues)
- Evidence of court misconduct (docket audit logs)
- Evidence of retaliation (communications, timing)

All of this is material to Defendant's Motion to Vacate and his constitutional rights.

GOOD CAUSE

Good cause exists for this discovery because:

1. These materials are in possession or control of State actors (Sheriff, Court, Prosecutor, JFS)

2. Defendant cannot obtain these materials through other means

3. The materials are directly relevant to pending Motion to Vacate and constitutional claims

4. Some materials are Brady material that should have been disclosed before plea

5. Some materials prove the conviction is void and must be vacated

6. Defendant has demonstrated specific need for each category of materials

RELIEF REQUESTED

1. ORDER all requested materials produced within 14 days;

2. STAY all proceedings until discovery is produced and Defendant has reasonable time to review;

3. COMPEL production of any materials claimed to be privileged with in camera review by the Court;

4. SANCTION the State for Brady violations by:
- Dismissing charges with prejudice, OR
- Vacating conviction and prohibiting retrial, OR
- Imposing other appropriate sanctions

5. REFER Brady violations to appropriate disciplinary authorities;

6. ORDER preservation of all electronic records and communications pending resolution of this case.

Respectfully submitted,

/s/ Jeremy Lee Shepherd
Jeremy Lee Shepherd, Pro Se
Email: jeremyshepherd07@outlook.com
Date: December 5, 2025

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served via email upon:

James F. Duranczyk, City Prosecutor
c/o pnickolite@cityofbryan.com

Date: December 5, 2025

/s/ Jeremy Lee Shepherd